

IN THE UNITED STATES COURT OF APPEALS  
FOR THE ELEVENTH CIRCUIT

NO. **23-12095-B**

Isaac Industries, Inc.

Plaintiff-Appellee

vs.

Bariven, S.A., et al.

Defendants-Appellants

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ON APPEAL FROM THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

CASE NO. 1:19-CV-23113-RNS

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**APPELLEE’S UNOPPOSED MOTION FOR EXTENSION OF TIME  
TO FILE ANSWER BRIEF**

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*Counsel for Appellee*

**CERTIFICATE OF INTERESTED PERSONS AND**  
**CORPORATE DISCLOSURE STATEMENT**

In accordance with Fed. R. App. P. 26.1 and 11th Cir. R. 26.1-1, 26.1-2, and 26.1-3, Appellee, Isaac Industries, Inc. certify that the following individuals and entities have an actual or potential interest in the outcome of the appeal:

1. Avan, David (President of Appellee, Isaac Industries, Inc.)
2. Avan, Molly (Vice President of Appellee, Isaac Industries, Inc.)
3. Avan, Rachel (Director of Appellee, Isaac Industries, Inc.)
4. Bariven, S.A. (Appellant)
5. Becerra, the Honorable Jacqueline (United States Magistrate Judge)
6. Bellorin Gonzalez, Jesus Eduardo (Sole Administrator of Pequiven)
7. Bianchi, Jaime (Counsel for Appellants)
8. Blasi, Fernando (Member of CAPA)
9. Boscán Prieto, Exeario Darío (Member of the Ad Hoc Administrative Board of Petróleos de Venezuela, S.A.)
10. Cárdenas, Julián (Member of the Ad Hoc Administrative Board of Petróleos de Venezuela, S.A.)
11. Council for the Management and Protection of Assets of the Republic of Venezuela (Consejo de Administración y Protección de Activos de la República de Venezuela) (“CAPA”)
12. DeLelle, Claire (Counsel for Appellants)

13. Goicoechea, Yon (Member of CAPA)
14. Goodman, the Honorable Jonathan (United States Magistrate Judge)
13. Gordon, Veronica (Counsel for Appellants)
14. Gourlis, Charles (Counsel for Appellee)
15. Grossbaum, Daniel (Counsel for Appellants)
16. Hogan Lovells US LLP (Former Counsel for Appellants)
17. Isaac Industries, Inc. (Appellee)
18. King, the Honorable James Lawrence (United States District Court Judge)
19. Leto, Matthew (Counsel for Appellee)
20. Leto Law Firm (Counsel for Appellee)
21. Linares, Javier (Member of the Ad Hoc Administrative Board of Petróleos de Venezuela, S.A.)
22. Lindsay, Alvin F., III (Former Counsel for Appellants)
23. Lorenzo, Richard C. (Former Counsel for Appellants)
24. Marcano, Gustavo (Coordinator of CAPA)
25. Medina, Horacio (Chairman of the Ad Hoc Administrative Board of Petróleos de Venezuela, S.A.)

26. Millan, Carlos (Member of CAPA)
27. Petroquímica de Venezuela, S.A. (Appellant)
28. Prada, Ricardo (Member of the Ad Hoc Administrative Board of Petróleos de Venezuela, S.A.)
29. Ribeiro, Rafael Rodrigues (Former Counsel for Appellants)
30. Sanchez, Alejandra (Counsel for Appellants)
31. Sanchez-Roig, Adrian Reinaldo (Former Counsel for Appellants)
32. Scola, the Honorable Robert N. (United States District Court Judge)
33. Uzcategui, Rene (Member of CAPA)
34. White & Case LLP (Counsel for Appellant)

Appellee, Isaac Industries, Inc. submits that it does not have any parent corporations and there are no publicly held corporations that own 10% or more of its stock.

/s/ Charles P. Gourlis  
Charles P. Gourlis

**APPELLEE’S UNOPPOSED MOTION FOR EXTENSION OF TIME  
TO FILE ANSWER BRIEF**

Pursuant to Federal Rule of Appellate Procedure 26(b) and Eleventh Circuit Local Rule 31-2(d), Appellee, Isaac Industries, Inc., requests a 16-day extension of time to file its Answer Brief. Counsel for Appellants Petroquímica de Venezuela, S.A. and Bariven, S.A. does not oppose the relief sought herein. In support of their motion, Appellees states as follows:

1. Appellants filed their Opening Brief on October 6, 2023.
2. On October 23, 2023, Appellee sought and obtained an “extension by phone” to file its Answer Brief. Therefore, Appellee’s Answer Brief is presently due on December 6, 2023.
3. Appellee requests a sixteen-day extension of time to prepare and submit its Answer Brief. First, counsel for Appellee spent significant time preparing for and participating in a trial in Broward County, Florida that started on November 7, 2023 and concluded on November 15, 2023. Second, Appellee’s counsel is scheduled to appear in two arbitration proceedings during the second week of December. Finally, counsel for Appellee will be out of the office for several days due to the Thanksgiving holiday.
4. For these reasons, and due to the complexity of the issues raised, Appellee respectfully requests a sixteen-day extension of time, until December 22, 2023, to file its Answer Brief. Counsel for Appellants does not oppose this relief.

5. This motion is being filed in good faith and for good cause and not for the purpose of any delay. Appellants will not be prejudiced if this unopposed motion is granted.

WHEREFORE, Appellee, Isaac Industries, Inc. respectfully requests a 16-day extension of time, up to and including December 22, 2023, within which to file its Answer Brief.

Dated: November 21, 2023

Respectfully submitted,

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*Counsel for Appellee*

**CERTIFICATE OF COMPLIANCE**

This motion complies with the type-volume limitations of Federal Rules of Appellate Procedure 27(d) and 32(a)(5) and (6) because it contains 280 words, excluding parts of the motion exempted by Rule 27(a)(2)(B), and has been prepared in proportionally spaced typeface using Microsoft Word in 14-point Times New Roman font.

/s/ Charles P. Gourlis  
Charles P. Gourlis

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 21st day of November 2023, the foregoing was electronically filed through this Court's CM/ECF system and a copy was electronically served through the CM/ECF system on all registered counsel of record.

/s/ Charles P. Gourlis  
Charles P. Gourlis